

Hearing Date: January 9, 2019
Hearing Time: 11:00 a.m.
Hearing Location: Rochester, NY
Objection Deadline: January 6, 2019

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Rochester,

Debtor.

Case No. 19-20905

Chapter 11

**NOTICE OF MOTION TO EXTEND
EXCLUSIVE PERIODS PURSUANT TO 11 U.S.C. § 1121(d)**

PLEASE TAKE NOTICE that The Diocese of Rochester, the debtor in the captioned chapter 11 case (the “Debtor”), by and through its attorneys, Bond, Schoeneck & King, PLLC, will move before the Honorable Judge Warren, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Western District of New York, United States Courthouse, 100 State Street Rochester, New York on the **9th day of January, 2020 at 11:00 a.m.**, or as soon thereafter as counsel can be heard, for an Order pursuant to section 1121(d) of title 11 of the United States Code, §§ 101, *et seq.*, as amended (the “Bankruptcy Code”):

1. extending until April 9, 2020 the Debtor’s period of exclusivity to file a chapter 11 plan pursuant to 11 U.S.C. § 1121(c)(2);
2. extending until June 8, 2020 the date by which the Debtor must obtain acceptance of its chapter 11 plan pursuant to 11 U.S.C. § 1121(c)(3); and
3. granting such other and further relief as this Court may deem just and proper.

**PURSUANT TO FRBP 9014 AND THE STANDING ORDERS
IMPLEMENTING DEFAULT PROCEDURES IN ROCHESTER AND
WATKINS GLEN, IF YOU INTEND TO OPPOSE THE MOTION, AT
A MINIMUM, YOU MUST SERVE: (1) THE MOVANT AND
MOVANT’S COUNSEL, AND (2) IF NOT THE MOVING PARTY (A)**

3474551.1

THE DEBTOR AND DEBTOR'S COUNSEL; AND (B) IN A CHAPTER 11 CASE, THE CREDITORS' COMMITTEE AND ITS ATTORNEY, OR IF THERE IS NO COMMITTEE, THE 20 LARGEST CREDITORS; AND (C) ANY TRUSTEE. IN ADDITION, YOU MUST FILE WITH THE CLERK OF THE BANKRUPTCY COURT WRITTEN OPPOSITION TO THE MOTION NO LATER THAN THREE (3) BUSINESS DAYS PRIOR TO THE RETURN DATE OF THE MOTION NOTWITHSTANDING THE DECEMBER 1, 2009 AMENDMENTS TO FRBP 9006(a). IN THE EVENT THAT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD ON THE RETURN DATE AND THE COURT WILL CONSIDER THE MOTION UNOPPOSED.

Dated: December 28, 2019

BOND, SCHOENECK & KING, PLLC

By: /s/ Stephen A. Donato

Stephen A. Donato

Charles J. Sullivan

Sara C. Temes

One Lincoln Center

Syracuse, NY 13202-1355

Telephone: (315) 218-8000

sdonato@bsk.com

csullivan@bsk.com

stemes@bsk.com

Attorneys for the Diocese of Rochester